



South Worcestershire Development Plan Review 2018 – Issues and Option Consultation Document.

Response by the Vale of Evesham Civic Society.

Questions and Options are copied from the Consultation Document and appear in normal type. The VECS response is set out in italics.

Question 1 : Evidence Base

Do you agree that the above list of technical studies is appropriate and sufficient to inform the SWDP? If not, what is missing, and why are these additional studies necessary?

The Green Infrastructure Strategy should be extended to include a plan showing the existing Green Infrastructure Network, so that any new proposals can be judged against their ability to extend and link to the network. Isolated areas of green spaces, especially in the urban areas, need to be linked together for the benefit of the users including the wildlife, functionally and visually.

An assessment needs to be carried out of the role of existing public buildings and identifying the need for new buildings that will enhance the role of the town within the area as a whole. This is particularly important for Evesham.

Question 2 : Vision

The vision set out above is that which is set out in the adopted SWDP. Is it appropriate to continue with this vision? If not, what changes should be made?

Yes, but in 6.7 rather than 'historic settlement cores' it would be clearer to refer to Conservation Areas and Listed buildings, which both have statutory force, together with the recognition that many of the Conservation Areas need active management to improve their offer to tourists and local residents. In 6.3 the provision of public transport needs to be extended to refer to the need to extend parking and access arrangements to the increasingly popular railway stations. In the same section, the potential to improve the strategic highway route of the A44 should be recognized and the knock-on effect of the need to improve traffic management in Evesham and the Vale to link with the improved A road.

The vision needs to be extended to refer to the need to rectify the short-comings in the infrastructure in the three districts, with particular reference to Evesham. Problems are known to exist in the sewer/water supply networks, highways and telephone/internet equipment. A full assessment is needed before significant new areas of development are allowed, to ensure that improvements to accommodate an expansion to the networks are implemented before the development takes place.

Question 3 : Objectives

Are the existing SWDP objectives, as set out above, still appropriate? If not, what should be changed?

6.8.8 – remove the word 'most', to emphasise the need for development to have good access to local services etc, which is at the heart of sustainable development.

6.8.13 – So far there is no defined Green Infrastructure Network (see Q.1 response above), therefore this needs to be extended to refer to the 'Identification and protection of the GIN'.

6.8.14 – this list should include reference to the protection of the flood plain. It should also replace 'highest quality' with 'Best and Most Versatile' agricultural land. The latter better reflects guidance in the National Planning Policy Framework (paragraph 170).

Option 1 : The Overall Development Strategy

Should the overall development strategy be based on:

- a. Rail Station Focussed Development – locate all significant new development within two miles of an existing, enhanced or proposed rail station.

Yes

- b. Continuation of the Adopted SWDP Development Strategy – locate new development throughout south Worcestershire on the periphery of the city, towns and villages linking to the existing road network.

No

- c. Increasing Densities through Regeneration – locate new development in existing urban areas, through intensification in urban centres and regeneration of underused or vacant sites, taking advantage of active travel and sustainable transport hubs, and reducing the need to travel. This option will not be sufficient to meet all the development needs of south Worcestershire.

Yes, together with 1 above. This should help to bring life back to town centres.

- d. Large Urban Extension – locate new development in large urban extensions, using existing transport corridors.

No. Preference is for a new settlement, ideally meeting the requirements of 1 above i.e. within 2 miles of a railway station. There is scope for such a new settlement around the Worcester Parkway Station and at Throckmorton airfield, which is within 2 miles of Pershore station..

Option 2 : Development Boundaries Review

Should the Development Boundaries Review:

- a. Make no changes to the current development boundaries.
- b. Progress with current Development Boundaries and only amend to include SWDPR housing, employment and mixed use allocations where they share a common boundary with a development boundary.
- c. Review existing Development Boundaries and identify new development boundaries in higher category villages where one does not already exist, using methodology which was subject to consultation (amended where appropriate) in August-October 2018.
- d. As for Option c above, plus extend development boundaries to include proposed SWDPR allocations where they share a common boundary with a current development boundary.
- e. Accept that certain smaller settlements can accommodate development of an appropriate scale even if a development boundary can not be readily identified in accordance with the methodology referred to in c above.

All reviews need to take account of the decisions taken on the Overall Development Strategy in Option 1. I.e if the criterion of within 2 miles of a railway station is adopted then all subsequent boundaries will follow from that decision. They also need to take account of the constraints and limitations imposed by other policies within the Plan e.g. avoiding development of the Best and Most Versatile Land, floodplain land etc.

Option 3 : Where should the new housing growth be located (you can identify more than one to establish your preferred approach)?

- a. At Worcester, towns and villages (as per the adopted SWDP).
- b. At a new settlement(s)/garden village(s); please indicate broad location and size.

Yes – see answer to Option 1 above.

- c. A greater proportion of growth generally in the villages.
- d. A greater proportion of growth generally in the towns.
- e. A greater proportion of growth at Worcester (please indicate broad locations) .

No Comment.

- f. In the Green Belt (please indicate broad location(s) and scale).

NO

The choices of location will depend upon the decisions taken on the Overall Development Strategy in Option 1. . I.e if the criterion of within 2 miles of a railway station is adopted then all subsequent development locations will follow from that decision.

Option 4 : Neighbourhood Area Housing Numbers

Should housing numbers for Neighbourhood Areas be determined on the basis of:

- a. The proportion of dwellings currently located within the Neighbourhood Area.
- b. The availability of services and facilities within the neighbourhood area as per the settlement hierarchy.

No comment

Option 5 : Employment Growth

Where should new employment be located:

- a. Alongside the housing growth Yes
- b. At/near motorway junctions No
- c. Along trunk road corridors (for example the A46) No
- d. Expand existing employment sites Yes
- e. Near existing rail stations or opportunities for new rail stations YES

Option 6 : Density

Should the SWDPR:

- a. Identify areas of Worcester City that can accommodate higher density development.
- b. Identify further areas and/or specific sites for higher density development.
- c. Continue with the density policy in the adopted SWDP (SWDP13).

No comment

Option 7 : Brownfield Land

Should the SWDPR:

- a. Maximise the re-use of brownfield land by allocating all available brownfield land including land outside of development boundaries.
No, this is not likely to be sustainable, due to the scattered, isolated nature of many of these sites in the rural areas.
- b. Allocate all deliverable brownfield sites within development boundaries.
Yes
- c. Only allocate brownfield land where sites can deliver all of the essential planning policy requirements, such as affordable housing and infrastructure contribution.
No

Option 8 : Best and Most Versatile Agricultural Land (BMVAL)

Should the SWDPR:

- a. Continue the current approach to resist development of 2ha or more on the BMVAL in order to minimise the amount lost to development (SWDP13h).
- b. Allow the development of BMVAL in sustainable locations.

Best and Most Versatile Agricultural Land should only be released for development in exceptional circumstances, following the guidance in the NPPF.

Option 9 : Market Housing Mix

Should the SWDPR:

- a. Continue to require a specified mix of homes to meet the needs of particular types of households.
Yes, with particular reference to the need for bungalows and ground-floor apartments for the elderly. Also, to acknowledge that many young people do not have cars and therefore homes with limited parking provision can encouraged, to provide for this type of household; this would be

particularly beneficial for developments in or close to town centres, with ease of access to services and would help to minimise the impact of the built development on the historic character of an area.

- b. Not include a policy setting out the housing mix required and leave it to market forces to determine what mix of housing is delivered.

No

- c. Identify specific sites for executive homes

No

- d. Remove the restrictions on sub dividing existing homes

Only in certain locations, to be defined. Policy needs to reference the need to maintain the external fabric of HMOs to avoid a detrimental visual impact on a locality.

Add a criterion to encourage the provision of plots for 'Build Your Own' home.

Option 10 : Affordable Housing

Should affordable housing beyond the 10% home ownership products promoted in the NPPF:

- a. Prioritise affordable homes for purchase, including shared ownership
- b. Prioritise affordable homes for rent.

Both types of affordable housing should be encouraged, ideally with a mixture provided.

Option 11 : Providing Housing for Older Residents

Should the SWDPR:

- a. Allocate certain sites specifically for accommodation for the older people.

Yes, only on small sites with good access to services and transport.

- b. Require strategic sites to deliver more accommodation for older residents such as retirement apartments or a care home.

This criterion should include specific reference to the provision of bungalows and ground-floor apartments.

- c. Restrict accommodation for older residents in locations which are less accessible by public transport and have limited services and facilities. *Yes*

Option 12 : Self and Custom Build Housing

Should the SWDPR:

- a. Require developers to offer a specified proportion of larger housing allocations as self and custom build plots. *Yes.*

- b. Allocate sites specifically for self and custom build housing.

Yes, in addition to a) above.

- c. Not have a specific policy but rely upon the development management process for self and custom build homes to come forward.

No, a much more positive approach is needed, as in a) and b) as so far few sites have been made available.

Option 13 : Access Standards

Should the SWDPR:

- a. Seek to apply enhanced accessibility or adaptability standards to new dwellings, e.g. to help meet the needs of older people and people who use wheelchairs. If so, what proportion of new dwellings should the standard be applied to?

Yes, but also link with the criteria of Option 11.

- b. Not seek to apply the access standard to any new dwellings. *No*

Option 14 : Residential Space Standards

Should the SWDPR:

- a. Apply the Nationally Described Space Standards to all new dwellings including conversions of existing buildings.
Yes, to ensure a basic minimum for all accommodation.
- b. Only apply National Space Standard to new dwellings which are not created by the conversion of existing buildings. *No*
- c. Not seek to impose the National Space Standard and instead allow the market to determine the size of new dwellings. *No*

Option 16 : Employment Growth

Should the SWDP Review:

- a. Identify those sites that are essential to the success of the south Worcestershire economy and seek to prevent their redevelopment for non- employment sustaining uses.
- b. Include a policy that seeks to prevent the redevelopment of employment land for residential purposes (except where this is permitted by national planning policy) but is more accommodating to proposals for change of use to other employment generating uses.

Any policy that applies criterion (b) must ensure that it allows the conversion of some town centre buildings to residential use or other alternative uses, to bring activity back into towns and to allow buildings to have a new use following the dramatic changes in the retail environment. Flexibility in policy will be needed when considering redevelopment or re-use of town centre buildings. Policy needs to specify that in any change to residential use, the appearance of the street scheme must be maintained.

Option 17 : Live/Work Units

Should the SWDPR:

- a. Continue to set out detailed requirements for live/work units as in SWDP8g.
- b. Continue to encourage live/work units, but only in specific locations or as part of live/work hubs.
- c. Set out a more relaxed policy for live/work units to encourage more to come forward.
- d. Not include specific policy on live/work units and instead rely on the other policies within SWDPR to guide decisions on employment led proposals.

Any policy for dealing with live/work units must ensure that it allows the conversion of some town centre buildings to residential/employment use, to bring activity back into towns and to allow buildings to have a new use following the dramatic changes in the retail environment.

Option 18 : The Rural Economy

Should the SWDPR:

- a. Allocate sites for appropriate employment uses in rural areas to diversify the rural economy and reduce the need to travel.
- b. Relax planning rules to allow land owners to extend rural employment sites and encourage larger farm diversification projects than those permitted by the General Permitted Development Order.
- c. Include a specific policy for large scale agricultural/horticultural development.
- d. Extend existing rural business parks.

Any policy must re-enforce the need to protect the AONB, Green Belt, BMVAL, historic landscapes, Conservation Areas, historic buildings.

Option 19 : How should retail centres change to meet the needs of south Worcestershire?

- a. Seek to consolidate stores in fewer streets; this would require amendments to the primary and secondary shopping frontage policy (SWDP10) to concentrate retail in a smaller area.
- b. Allocate surplus retail units for housing development.
- c. Seek opportunities to bring out of town stores back into the city centre.
- d. Encourage café culture, with more retail units converting to cafes and casual dining restaurants.

All of these elements are likely to be needed to regenerate the retail centres. Flexibility is the key.

Option 20 : Planning for the Future of the High Street

Should the SWDPR:

- a. Increase the range of activities planning policy will support in town centre premises.
- b. Tighten planning controls for change of use in the most important town centre streets.
- c. Seek to limit the total number of fast food outlets wherever they are located, rather than just in defined centres.
- d. Only define the boundaries of retail centres in the main and other towns leaving smaller centres to evolve according to local demand for services.
- e. Encourage café culture and casual dining to replace traditional retailing activities.
- f. Identify specific centres/locations for public realm improvement projects (please specify locations)

The future of town centres depends upon bringing back activity, to counter the out-of-town and edge of town retail developments. Encouraging the development of residential accommodation above the shops would contribute to this, as will a) increasing the range of activities.

In town centre Conservation Areas, including Evesham, public realm improvements are needed, but so is encouragement for private property owners in upgrading/repairing their premises. A scheme is needed, devised by the District Council working with the Town Council and with representatives of businesses and landlords, to achieve the common objective of improving the Conservation Area for all.

Question 8 : Retail Centres

How could the retail function of our retail centres be best maintained?

In addition to the points made above, the following should be considered:

Encouraging pop-up shops for local craft people, charities or new businesses not yet ready to take on a lease to test the local retail market. The District Council could waive the rates payments and could encourage landlords to allow a rent-free period, possibly to be extended in the event that the 'tenants' undertake some property improvements.

Encouraging professional services businesses to relocate to the main town centre from the periphery, by reducing the rates payable. This would have the knock on benefit of releasing the property back into the residential market.

Option 21 : Outside of the main town centres how should the plan promote strong neighbourhood centres and active street frontages as required by the NPPF?

- a. Seek to protect retail uses on the ground floor.
- b. Allow vacant retail units to be converted to other uses including housing.
- c. Strictly control the range of uses in neighbourhood shopping areas so that a range of commercial services is maintained and single retail uses such as takeaway food do not dominate centres.

Option c) appears to offer the best chance of promoting strong neighbourhood centres.

Option 22 : Hotel Accommodation

Should the SWDPR:

- a. Allocate a specific site for a four star hotel within Worcester city centre.
- b. Set out a positive development management policy for a four star hotel within Worcester city Centre.
- c. Not make a specific allocation or include an explicit policy to attract a four star hotel to Worcester city centre.
- d. Seek to address other hotel accommodation needs across south Worcestershire.

Evesham needs a good hotel at its heart; policy needs to encourage a hotel development, possibly as part of the forthcoming Riverside re-development scheme.

Support should be offered in this policy for keeping country pubs open, which could mean some extension/adaptation to allow accommodation as well. Also village pubs should be supported by encouraging additional services to be run from the buildings, such as a small shop/post office etc.

Option 23 :Tourist Accommodation

Should the SWDPR:

- a. Update the tourist accommodation policy to include new forms of accommodation, such as glamping, pods and safari tents, and take a more flexible approach to allowing these uses.
- b. Update the definition of tourist accommodation so that new forms of accommodation are covered within the existing policy.

Provided that new forms of accommodation are supported, the choice of policy is not critical.

Option 24 : Transport

Should the SWDPR:

- 1 Promote the use of electric vehicles by requiring all new employment parking to have electric charging points.
- 2 Promote the use of electric vehicles by requiring all new residential development to have electric charging points for all properties.
- 3 Integrate walking and cycling routes to community facilities, retail outlets, education and employment opportunities in all new housing developments to an agreed standard.
- 4 Seek to promote the sustainable transport options set out in Local Transport Plan 4 as a priority.
- 5 Review HGV parking and promoted routes through south Worcestershire to minimise the impact on communities.
- 6 Explore alternative options for rural transport to offset the impact of loss of rural transport.

The plan should include 1-4. Item 3 should be extended to include railway stations as a specific destination. Item 4 needs to be extended to include reference to a significant increase in parking at all railway stations as part of a sustainable transport network. Item 5 should be revised to read to promote additional capacity for off-highway HGV parking. Item 6 is more for the Local Transport Plan than the Local Plan.

Question 9 : The Historic Environment

Do you support the proposed approach to protecting the historic environment (policies SWDP6 and SWDP24)?

Yes

Option 25 : Design Policy

Should the SWDPR:

- a Continue with the adopted design policy (SWDP21) which sets out a number of requirements which developments should meet.
- b Require all new housing development to achieve Building for Life requirements.
- c Identify strategic sites and locations and include masterplanning and design codes for them within the SWDPR.
- d Identify strategic sites for which masterplans and design codes will be prepared as Supplementary Planning Documents once the Plan is adopted.

A, b, and c are supported. In addition, development in Conservation Areas must take account of the specific historic character of the Area, as defined in Conservation Area Appraisals and Management Plans. Where these do not exist, they should be itemised as a target for preparation within the first 5 years of the Plan period.

Question 10 : Green Infrastrucutre

Could the policy approach be improved by including increased guidance to cover the issues set out above?

Yes. And identify the existing Green Infrastructure Network on a map and indicate desirable new/improved links in the network.

Option 26 : Green Infrastructure

Should the SWDPR:

- a. Include GI plans or strategies for strategic sites to ensure that they link to the wider GI network and address the relevant GI priorities.
- b. Maintain a percentage requirement for GI (adopted policy).

GI plans and strategies should be required for all sites and for these to demonstrate that they link to the existing network.

Option 27 : Biodiversity

Should the SWDPR:

- a. Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate.
- b. Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement.
- c. Seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider biodiversity network.
- d. Require, through policy, increased long-term monitoring of biodiversity mitigation and enhancement measures on development sites.

All of these.

Option 28 : Green Space

Should the SWDPR:

- a. Continue to protect all currently designated green space.
- b. Review all designated green spaces and consider whether any are surplus, poor quality greenspace that could be released for development.

Green spaces within built up areas should be carefully considered for possible release for development, but poor quality should not be the determining factor, as this may be due solely to insufficient resources for proper management and improvement. In particular, open space on the fringe of Evesham historic town centre should be protected to ensure that there is scope for extending the range of amenities appropriate to a town centre location, given the future significant increase in the population of the town. An assessment needs to be carried out of the role of existing public buildings and identifying the need for new buildings that will enhance the role of the town within the area as a whole.

Question 12 : Landscape Character

Should SWDP25 be revised to take into account impact on views and visual amenity?

Yes.

Option 30 : Health and Well-Being

Should the SWDPR:

- a. Include a new policy for health and wellbeing that also links up with other relevant policies in the SWDPR.
- b. Include new health and wellbeing requirements in an already established policy, or policies, such as design and open space policies.
- c. Continue to rely on the Planning for Health SPD in its current form for guidance.

As long as health and well-being are covered by a policy, the wording can be determined by the Planning Authority.

Option 32 : Flood Risk

Should the SWDPR:

- a. Continue with the adopted policy approach (SWDP28c) of blue, red and yellow floodplain zones and continue to prevent all development and redevelopment within the blue and red zones (those with the highest flood risk).

- b. Take a more flexible approach within the red zone, allowing alterations, extensions and redevelopment of sites which are already developed providing that this provides betterment in terms of flood risk.
- c. Adopt a Catchment Based Approach (CaBA) and encourage collaborative working with catchment partnerships, using catchment plans, with the aim of providing benefits to the local community by reducing flood risk, clearing pollution, protecting water resources, improving bio-diversity and amenity value.
- d. Identify known areas associated with flooding caused by surface-water run-off and only allow development that could affect such areas if they contribute or resolve existing problems before development commences.

Continue with option a, but add a section in the Plan to cover the need to tackle the problem of flooding in the valleys by means of a range of measures to reduce run-off from the surrounding hills e.g. promote tree planting, revised cultivation practices, re-engineering of water courses to slow run-off, the provision of additional water storage above the recognized flood plains.

Option 33 : SuDS

Should the SWDPR:

- a. Provide guidance and / or requirements on how developers should deal with the management and maintenance of Suds components throughout their lifetime.
- b. Require developers to demonstrate that the three objectives of SuDs; to control the quantity and rate of run-off from a development; to improve the quality of the run-off; and to enhance the nature conservation, landscape and amenity value of the site and its surroundings, will have equal standing.
- c. Develop a policy that requires SuDS are provided on all development proposals unless in exceptional circumstances.

All three, but to allow SuDS provision on small sites (e.g. less than 10 units or the commercial equivalent) to be provided off-site by means of a financial contribution. This could then be used to contribute to reducing run-off elsewhere (see Option 32 above).

Option 35 : Energy Requirements in New Developments

Should the SWDPR:

- a. Continue to require 10% of all energy within new developments to be generated from on-site renewable energy sources.
- b. Adopt a higher target for on-site renewable energy generation in new development.
- c. Not require any renewable energy generation and instead rely on carbon reduction measures which are being delivered through changes to building regulations.
- d. Require heat mapping for large scale allocations within the SWDPR.
- e. Set out a carbon reduction target rather than a renewable energy target for new development.
- f. Establish a south Worcestershire / district level Community Energy Fund providing developers with a route to compliance with carbon reduction targets allowing them to offset any carbon reductions they are unable to achieve on site through payment into an energy fund.

Adopt b. and f.

Option 36 : Stand Alone Renewable Energy

Should the SWDPR:

- a. Seek to allocate specific sites for specific types of renewable energy where appropriate sites come forward.
- b. Provide a policy framework to support the delivery of renewable energy projects without making specific site allocations.
- c. Identify broad areas where wind turbines could be acceptable.

Adopt b. and c.